

UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: JOSEPH REYNOLD STULL :  
 : CHAPTER 13  
Debtor(s) :  
 :  
JACK N. ZAHAROPOULOS :  
CHAPTER 13 TRUSTEE :  
Movant :  
 :  
vs. :  
 :  
JOSEPH REYNOLD STULL :  
 :  
Respondent(s) : CASE NO. **1:25-bk-01918**

TRUSTEE'S OBJECTION TO CHAPTER 13 PLAN

COMES NOW Jack N. Zaharopoulos, Standing Chapter 13 Trustee, who objects to confirmation of the above-referenced debtor(s)' plan for the following reason(s):

1. Statement of Financial Affairs #27 and Schedule B #19/#37 lack description. The Debtor owns T&R Auto Service.
2. The Trustee avers that debtor(s)' plan is not feasible based upon the following:
  - a) The plan is underfunded relative to claims to be paid – 100% plan (based on the liquidation value).

WHEREFORE, the Trustee alleges and avers that the plan cannot be confirmed and, therefore, the Trustee prays that this Honorable Court will:

- a. Deny confirmation of debtor(s)' plan.
- b. Dismiss or convert debtor(s)' case.
- c. Provide such other relief as is equitable and just.

Dated: August 14, 2025

Respectfully submitted:

/s/ Jack N. Zaharopoulos  
Standing Chapter 13 Trustee  
8125 Adams Drive, Suite A  
Hummelstown, PA 17036  
(717) 566-6097

CERTIFICATE OF SERVICE

I hereby certify that I have served the within Objection by electronically notifying parties or by depositing a true and correct copy of the same in the United States Mail at Hummelstown, Pennsylvania, postage prepaid, first class mail, addressed to the following:

NICHOLAS G PLATT, ESQUIRE  
230 YORK STREET  
MOONEY LAW  
HANOVER, PA 17331-

Dated: August 14, 2025

/s/ Jack N. Zaharopoulos  
Office of Jack N. Zaharopoulos  
Standing Chapter 13 Trustee